

From: [Kerry Culpepper](#)
To: ["mkvcage@gmail.com"](mailto:mkvcage@gmail.com)
Subject: mkvcage.fun movie piracy
Date: Thursday, September 5, 2019 5:30:00 PM

Dear Mr. Faizan,

Our law firm has filed two Federal copyright infringement lawsuits in the U.S. District Court for the District of Hawaii and requests for subpoenas to be issued on behalf of our clients, Bodyguard Productions, Inc and HB Productions, Inc.. The lawsuits were filed against multiple Defendants for distributing and promoting piracy apps for illegally sharing copyright protected content, including our clients'. We subsequently obtained identifying contact information for the registrants and operators of these websites from the registrars and host providers. Your contact information was supplied to us by Namechop as one of the Defendants who has illegally promoted and/or distributed torrent copies of our clients' motion pictures in response to a subpoena. We are sending you this letter as a courtesy before we take additional legal action which may result in additional costs and fees.

Ripping streams and Blu-ray discs to make copies of our clients' motion pictures and torrent files and promoting and/or distributing torrent files for the purposes of infringing copyright protected material constitutes contributory copyright infringement, which is a violation of the Federal copyright statute, found at 17 U.S.C. § § 501-506. The Federal copyright statutes provide protection for copyright owners and permits the copyright owner to impound your material, recover their attorney's fees from the infringer, and seek damages of \$750.00 to \$150,000.00 per work, depending on the circumstances surrounding the infringement.

Please appreciate that our clients invested significant time, effort and money in making and marketing their motion pictures. Accordingly, they request financial compensation for the damages caused by piracy websites such as the yours.

We would like to extend an opportunity for you to resolve this issue outside of Court. We would like for you to agree to cease all promotion and/or distribution of piracy apps and torrent files and pay a small portion of our clients' damages. If you agree, you will avoid becoming a Defendant in a lawsuit.

Please let me know if you are interested in discussing this opportunity. Please note that my clients will not ignore you simply because you are in a foreign country. Our clients have pursued litigation against individuals and companies in India, Pakistan, Vietnam and Ukraine for promoting piracy apps.

This offer will expire on 9/8/2019 if we receive no reply from you. We can extend these deadlines if you indicate to us prior to the deadline that you need more time to engage legal counsel.

Do I need my own attorney?

We strongly encourage you to consult with an attorney to review your rights in connection with this matter. If you obtain an attorney, please have them contact me. Legal assistance may be

available from the following:

HSBA Lawyer Referral & Information Service (LRIS)
(808) 537-9140
<http://hawaiiattorneyreferral.com/>
Legal Aid Society of Hawaii
www.legalaidhawaii.org
808-536-4302 (Oahu)
Volunteer Legal Services Hawaii
www.vlsh.org
(808) 528-7046 (Oahu)

We thank you in advance for your anticipated cooperation in this matter, and we look forward to resolving our client's claim on an amicable basis.

Sincerely,

Kerry S. Culpepper
kculpepper@culpepperip.com

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